



UNITED STATES MARINE CORPS

HEADQUARTERS MARINE CORPS AIR STATION EL TORO
PO BOX 95001
SANTA ANA CA 92709-5001

M60050.002718
MCAS EL TORO
SSIC #5090.3

IN REPLY REFER TO:

Cert. No. P115386418
6284
1AU
8 Mar 99

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

California Environmental Protection Agency
Department of Toxic Substances Control, Region 4
Attn: Mr. John Scandura
Chief Office of Military Facilities
Southern California Operations
5796 Corporate Avenue
Cypress, CA 90630

RE: Federal Facility Agreement Schedule, Marine Corps Air Station (MCAS) El Toro

Dear Mr. Scandura:

This letter is to request changes to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) -2B (Sites 2 and 17) requires a revised milestone deliverable date for the draft final Record of Decision (ROD). OU-3 (Sites 8, 11, and 12) requires a revised submittal date for the draft ROD. Sites 7 and 14, also part of OU-3, require a revised submittal date for the draft remedial investigation (RI) report.

This letter is also to formally agree with the U.S. Environmental Protection Agency (EPA) and Cal-EPA requests that the OU-2C (Sites 3 and 5) draft ROD to be submitted on March 15, 1999 rather than May 4, 1999 as requested in our letter to you of November 30, 1998. Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. We understand that these proposed new submittal dates are acceptable per our March 4, 1999 BRAC Cleanup Team (BCT) conference call discussions. This extension request is made pursuant to Section 9.2 (g) of the FFA.

Operable Unit (OU) -2B (Sites 2 and 17)

Comments on the draft ROD from regulatory agencies were significant (monitored natural attenuation at Site 2) and the request for additional institutional control (IC) language that is above and beyond that in RODs recently developed or approved by the U.S. EPA in the state of California. Additional time is required for us to respond to and incorporate the requested additional IC details and coordinate our efforts with the U.S. Fish and Wildlife Service (USFWS), the federal agency that will be receiving these sites as part of a federal-to-federal property transfer. We request a seven-week

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extension to the draft final ROD submittal. No other OU-2B submittals are impacted by this request. The proposed new date would change from April 8, 1999, to May 27, 1999.

OU-3 (Sites 8, 11, and 12)

Both the U.S. EPA and Cal-EPA provided new comments on the draft final proposed plan for Sites 8, 11, and 12 that was submitted on February 4, 1999. Since the document is to be revised due to the new input, the start of the 30-day public comment period must be postponed. If the current April 7, 1999, FFA submittal date for the draft ROD is not also pushed back, the draft ROD submittal would come before or during the rescheduled public comment period. In order to release the draft ROD after public comment, we request a two-month extension to the draft ROD submittal. No other Site 8, 11, and 12 submittals are impacted by this request. The proposed new date would change from April 7, 1999, to June 7, 1999.

OU-3 (Sites 7 and 14)


Over the past several months we have been developing the planning documents for the final remedial investigation efforts for sites 7 and 14, as well as for additional field work at site 16. Our FFA submittal schedule for the draft RI report was based on an accelerated schedule of production and reviews since our documentation would follow closely with the previously accepted planning documents used for the other OU-3 sites. Our current progress has not allowed us to meet the FFA schedule previously established. Our efforts in updating the risk requirements, statistical sampling analysis approach, shortened FFA review periods, and the revising of the Quality Assurance Program Plan (QAPP) have all contributed to extensions in our initial estimates. Also, much of our management resources have been required on the landfill and groundwater, which we all understand to be priority issues at MCA El Toro. We request a nineteen-week extension to the draft RI submittal. No future Site 7 and 14 submittals are impacted by this request. The proposed new date would change from March 17, 1999, to July 29, 1999.

These new revised dates are reasonable given the complexity and high resource requirement associated with the MCAS El Toro Installation Restoration Program.

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Please call me at (949) 726-3470 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Joyce", with a stylized, cursive script.

JOSEPH JOYCE
Base Realignment and Closure
Environmental Coordinator
By direction of
the Commanding General

Enclosure: 1. Appendix A FFA Schedule of Submittals

Copy to:
Glenn R. Kistner, US EPA
Patricia Hannon, Santa Ana RWQCB

APPENDIX A

MCAS El Toro Schedule

	Current	New	Change in
<u>Operable Unit (OU)-1: Site 18</u>	<u>Completion Dates</u>	<u>Completion Dates</u>	<u>Dates</u>
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	9 Nov 93	No Change	
Draft Remedial Investigation	30 Dec 94	No Change	
Draft Interim Action Feasibility Study	15 Oct 95	No Change	
Draft Final Interim Action Feasibility Study	9 Aug 96	No Change	
*Agency Approval of Draft Final	11 Oct 96	No Change	
*Response to Regulatory Draft Final Comments	15 Jan 98	No Change	
Draft Proposed Plan	18 Dec 95	No Change	
*re-Draft Proposed Plan	24 Nov 98	No Change	
Draft Final Proposed Plan	1 Apr 99	No Change	
Draft Interim Record of Decision	2 Sep 99	No Change	
<u>OU-2A: Site 24 (Vadose Zone)</u>			
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
Draft Remedial Investigation	20 Feb 96	No Change	
Draft Feasibility Study	9 Aug 96	No Change	
Draft Proposed Plan	11 Mar 97	No Change	
Draft Record of Decision	1 Jul 97	No Change	
Draft Final Record of Decision	24 Sep 97	No Change	
Draft Remedial Design/Remedial Action Work Plan	6 Jan 98	No Change	
Draft Final Remedial Design	11 Aug 98	No Change	
Draft Construction Quality Assurance Plan	11 Aug 98	No Change	
Draft Construction Quality Control Plan	11 Aug 98	No Change	
Draft Contingency Plan	11 Aug 98	No Change	
Draft Project Closeout Report	22 Apr 02	No Change	
<u>OU-2A: Site 24 (Groundwater)</u>			
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
Draft Remedial Investigation	20 Feb 96	No Change	
Draft Feasibility Study	9 Aug 96	No Change	
Draft Final Feasibility Study	5 Dec 97	No Change	
*Agency Approval of Draft Final	23 Mar 98	No Change	
Draft Proposed Plan	24 Nov 98	No Change	
Draft Final Proposed Plan	1 Apr 99	No Change	
Draft Interim Record of Decision	2 Sep 99	No Change	
<u>OU-2B: Sites 2 & 17</u>			
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
Draft Remedial Investigation	20 Mar 96	No Change	
Draft Final Remedial Investigation	6 Sep 96	No Change	
Draft Feasibility Study	6 Sep 96	No Change	
Draft Final Feasibility Study	18 Mar 97	No Change	
Draft Proposed Plan	18 Sep 97	No Change	
Draft Final Proposed Plan	28 Jan 98	No Change	
Draft Record of Decision	4 Nov 98	No Change	
Draft Final Record of Decision	8 Apr 99	27 May 99	+7 weeks

APPENDIX A

MCAS El Toro Schedule

	Current	New	Change in
<u>OU-2C: Sites 3 & 5</u>	<u>Completion Dates</u>	<u>Completion Dates</u>	<u>Dates</u>
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
Draft Remedial Investigation	20 Apr 96	No Change	
Draft Final Remedial Investigation	8 Oct 96	No Change	
Draft Feasibility Study	8 Oct 96	No Change	
Draft Final Feasibility Study	13 Feb 97	No Change	
Draft Proposed Plan	18 Sep 97	No Change	
Draft Final Proposed Plan	28 Jan 98	No Change	
Draft Record of Decision	4 Nov 98	15 Mar 99	(+3 month concurrence)
 <u>OU-3: Sites 4, 6, 9, 10, 13, 15, 19, 20, 21 & 22 and OU-2A: Site 25</u>			
Draft Remedial Investigation	20 Nov 96	No Change	
Draft Feasibility Study	20 Mar 97	N/A	
Draft Proposed Plan	15 Apr 97	No Change	
Draft Record of Decision	21 Aug 97	No Change	
 <u>OU-3: Sites 8, 11, & 12</u>			
Draft Remedial Investigation (included Site 16)	20 Nov 96	No Change	
Draft Feasibility Study (FS)	10 Jul 97	No Change	
Draft Final Feasibility Study	13 Jan 98	No Change	
*Agency Approval of Draft Final	22 Jun 98	No Change	
Draft Proposed Plan	28 Jul 98	No Change	
Draft Final Proposed Plan	4 Feb 99	17 Mar 99	(new comments)
Draft Record of Decision	7 Apr 99	7 Jun 99	+2 months
 <u>OU-3: Sites 7, 14, & 16</u>			
Draft Remedial Investigation (sites 7 & 14 only)	17 Mar 99	29 Jul 99	+19 weeks
Draft Feasibility Study	19 Oct 99	No Change	
Draft Proposed Plan	24 May 00	No Change	
Draft Record of Decision	29 Dec 00	No Change	
 <u>OU-3: Site 1</u>			
Draft Remedial Investigation	4 Jan 00	No Change	
Draft Feasibility Study	11 Sep 00	No Change	
Draft Proposed Plan	18 Apr 01	No Change	
Draft Record of Decision	14 Dec 01	No Change	

This schedule reflects current/proposed FFA milestones that are subject to change.

* Not an enforceable FFA deliverable.